

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

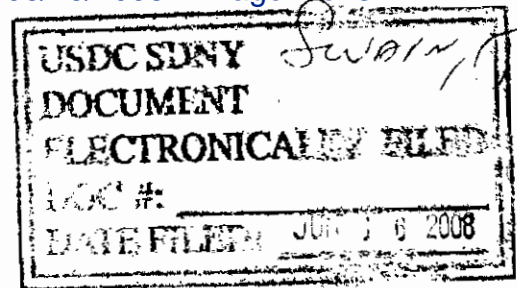
WEDGEWOOD TACOMA LLC, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIGROUP GLOBAL  
MARKETS INC., and CITI SMITH BARNEY,

Defendants.



Case No. 08-CV-4360 (LTS)

JUDGE LAURA T. SWAIN

STIPULATION AND  
[PROPOSED] ORDER

A handwritten signature, likely of Judge Laura T. Swain, written in ink.

WHEREAS, Plaintiff in the above-captioned action alleges claims arising out of the same facts and circumstances as plaintiffs in certain other actions pending before this Court;

WHEREAS, the complaint in the above-captioned action is governed by the provisions of the Private Securities Litigation Reform Act ("PSLRA");

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties herein, that:

- (a) Defendants do not waive any defenses, objections or arguments;
- (b) Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the complaint in the above-captioned action;
- (c) Plaintiff shall have 60 days from the entry of the order pursuant to the PSLRA appointing Lead Plaintiff(s) and Lead Counsel to file a consolidated amended complaint (the "Complaint");
- (d) Defendants' last day to move, answer or otherwise respond shall be extended to and including the date 60 days after the filing of the Complaint;

(e) in the event any of the Defendants move to dismiss the Complaint:

1. Plaintiff shall have 60 days from the date such motion is served to serve opposition papers; and

2. Defendants shall have 30 days from the date opposition papers are served by Plaintiff to serve reply papers.

Dated: June 11, 2008  
New York, New York

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SO ORDERED: 

U.S.D.J.

6/16/08